CW# Name	Allegation	Keatly Investigation	Keatly Interview Notes	Keatly Testimony
Peggy Burns	durns [44: According to CW1, the	TAXMIN		
	ratings for projects were			
	based on objective criteria,			
	the project rating status was			
	established by the main			
	Lockheed Martin			
	headquarters, and every			
	IS&GS project was			
	evaluated on a monthly			
	basis. The project			
	evaluations were conducted			
	by the program managers for			
	each project and the			
	stoplight status was loaded			
	into a "dashboard" system			
	that was hosted on Lockheed			
	Martin's intranet. CW1			
	stated that Defendant			
	Gooden reported the status			
	of IS&GS projects to			

For Burns, all citations are to Ex. 24 (Burns Mem.). For Hawn, all citations are to Ex. 26 (Hawn Mem.). For Morrison, all citations are to Ex. 30 (Morrison Mem.). For Asbury, all citations are to Ex. 32 (Asbury Mem.). For Nimmons, all citations are to Ex. 34 (Nimmons Mem.). Because Parsons confirmed the vast majority of the information attributed to him in the Complaint, his inclusion would be duplicative and is therefore not reflected herein.

For Burns, all citations are to Ex. 25 (Burns Notes 9/13). For Hawn, all citations are to Ex. 27 (Hawn Notes 9/29). For Morrison, all citations are to Ex. 31 (Morrison Notes 9/19). For Asbury, all citations are to Ex. 33 (Asbury Notes 9/22). For Nimmons, all citations are to Ex. 35 (Nimmons Notes 9/27).

All citations are to Ex. 22 (Keatly Dep.).

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Allegation	Lockheed Martin's other senior executives.
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Allegation	¶48: CW1 stated that the Sentinel Program had problems because it had been priced at a very low rate.
Name	Peggy Burns
CW#	CW1

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Allegation	¶49: According to CW1, the TSA was not satisfied with the work performed by
Name	Peggy Burns
CW#	CW1

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Allegation	¶24: CW2 worked as a Business Area Manager in the IS&GS Civil Segment of Lockheed Martin during the Class Period and served in the defense/government contracting field for 30 years. CW2 had regular interactions with Defendant Gooden and other Business Area Managers.
Name	Pamela Hawn
CW#	CW2

Keatly Testimony		
Keatly Interview Notes		
Keatly Investigation Memo		
Allegation	· .	¶35: It was clear by the end of 2008 and early 2009 that 2009 was going to be a very difficult year for IS&GS and that financial goals for IS&GS for 2009 could not be achieved. CW2 maintained reports of the
Name		Pamela Hawn
CW#		CW2

Keatly Testimony	
Keatly Interview Notes	
Keatly Investigation Memo	
Allegation	performance of his/her area of IS&GS compared with the projections that showed that the goals were not being achieved and could not be achieved.
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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶36: CW2 and CW3, a VP of Strategic Development in IS&GS, also stated that Defendant Gooden was told at the beginning of 2009 that the projections for 2009 for IS&GS were overstated. According to CW2, while Lockheed Martin knew that the goals for IS&GS couldn't be achieved, shareholders did not know this information. According to CW2, Defendants Stevens and Tanner received information about IS&GS directly from Defendant Gooden and Gooden's finance manager, Jeff MacLuachlan.			

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Allegation	¶38: According to CW2, Lockheed Martin deliberately underbid on	programs and knew that it could not perform the work	on many programs without large cost overruns.
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Allegation	¶43: According to CW2, due to cost cutting in 2008, IS&GS primarily had "low" paid personnel assigned to programs, which negatively impacted execution, performance and customer satisfaction. This, in turn, resulted in fewer contract wins for Lockheed Martin during 2009.
Name	Pamela Hawn
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Allegation	¶48: According to CW2, the Sentinel Program was placed into Red status by early 2009 and problems with the Sentinel Program were caused in part by the inexperience of IS&GS personnel assigned to the program.
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Allegation	,	¶52: According to CW2, the Mission Integration and Development ("MIND") program and GeoScout program initiated by the National Geospatial-Intelligence Agency, were two IS&GS Intelligence Segment programs that experienced problems in early 2009. Lockheed Martin was a subcontractor to Raytheon for the MIND program. In both the first and second quarters of 2009,
Name		Pamela Hawn
CW#		CW2

	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
	the MIND program had been reduced in scope and value ("de-scoped") because of Lockheed Martin's poor performance.			
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<u>Case</u> :	1:11-cv-05026-JSR	Document 76-37	Filed 07/19/12	Page 30 of 80
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Allegation	¶53: Beginning in 2007, the main Lockheed Martin corporate office began closely monitoring troubled IS&GS programs. According to CW2, there were monthly corporate review meetings where the troubled status of programs like the Sentinel Program, GeoScout, MIND, and HR Access were discussed. CW2, who participated in these corporate review meetings, stated that among the issues discussed was the
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	impact that troubled programs would have on quarterly and year-end financial results.			
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Allegation	¶55: During 2Q09, IS&GS also experienced problems with projects for the U.S. Department of State and experienced delays in getting funded because of staffing issues. According to CW2, delays in funding were due in part to inexperienced personnel at Lockheed Martin and the Department of State.
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Case 1:11-cv-05026-JSR Document 76-37 Filed 07/19/12 Page 42 of 80

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Allegation		¶56: There was a systematic procedure for Lockheed Martin to obtain funding for projects for the Department of State. Before Lockheed Martin could bill the costs to the Department of State and generate fees, the Department of State was required to submit a request to receive funds for the project. The funding request process typically took between 45-60 days. As of 2Q09, Lockheed Martin had already incurred costs on programs for the Department of State, but the funding requests had not yet been
CW# Name		CW2 Pamela Hawn

 Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
	submitted. CW2 stated that it was clear that the			
	inexperienced personnel at			
	the Department of State were unfamiliar with the			
	funding submittal process and did not know how to			
	submit a funding request.	:		
a de la constanta	According to CW2,			
	forecasted revenues			
	associated with Department			
	of State projects for 2Q09,			
	even though there was no			P
-	way for revenues to be			
	generated that quarter			
	because Iunding requests			
	time. Lockheed Martin			
	knew during the Class			
	Period that these projects			
	would not get funded during 2009.			
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Allegation	¶65: [D]uring March 2009 (before the start of the Class
Name	Pamela Hawn
CW#	CW2

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Allegation	Period), Defendant Gooden approached CW2 and pressured CW2 to represent that his/her area in IS&GS had \$2.5 billion in backlog for 2009. CW2 told Defendant Gooden and others that worked with Gooden that \$2.5 billion in backlog was not reasonable. Defendant Gooden, with the assistance of others, ignored CW2's backlog report and changed the backlog figures to reflect a figure much higher than the backlog computed by CW2. According to CW2. According to CW2. Defendant Gooden grossly overstated the actual backlog for IS&GS.
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CW4	Victor Morrison	¶39: CW4 stated that Defendant Gooden, along with VP of Business Development, Tom Oles, were directly responsible for the strategy of underbidding on programs. CW4 also stated IS&GS was focused on cash flow instead of profitability and that IS&GS deliberately understated the cost of labor required for programs. CW4 added that IS&GS often fired employees in order to reduce labor costs. This, however, resulted in inexperienced workers being assigned to projects, which caused various execution problems.			

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Allegation	#48: Defendant Gooden was kept apprised of developments about the Sentinel Program and participated in regular conference calls with CW4 and others to discuss this program.
Name	Victor
CW#	CW4

Keatly Testimony	
Keatly Interview Notes	
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Allegation	f51: CW4 learned in the first and second quarters of 2009 about significant problems with four large IS&GS programs, including a contract with the Veterans Affairs and Federal Reserve
Name	Victor Morrison
CW#	CW4

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Allegation	in Cleveland, OH, the Sentinel Program, HR Access for the TSA, and a help desk program for the National Aeronautics and Space Administration.			
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Allegation	¶35:[T]he financial projections for IS&GS's 2009 performance, which were formulated during
Name	Ken Asbury
CW#	CW5

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Allegation	stated that projections for IS&GS for 2009 were set from the top down as opposed to being based on reasonable estimates from IS&GS's division leaders.
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Case 1:11-cv-05026-JSR Document 76-37 Filed 07/19/12 Page 65 of 80

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# Name		
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Allegation			¶36: In February 2009, it was clear to CW5 and other IS&GS division leaders that the full year 2009 projections for IS&GS could not be achieved and CW5
Name		•	Ken Asbury
CW#			CW5

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Allegation	and other division leaders told this to Defendant Gooden at that time.				
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Allegation		¶45: According to CW3 and CW5, Lockheed Martin held weekly Tuesday telephone conference calls referred to as Red Program Review Meetings during which each IS&GS program classified as Red was discussed.
Name	·	Ken Asbury
CW#		CW5

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Allegation	49: CW5 stated that HR Access was placed in Red status during the Class Period.
Name	Ken Asbury
CW#	CWS

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Allegation	\$\ \frac{1}{52}\$: According to CW6, both the GeoScout and MIND programs encountered significant problems during 2009 and
Name	Karen Nimmons
CW#	CW6

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	GeoScout also encountered problems during 2008.					
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